

TX12432

JAN 3 1986

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Mr. Bryan W. Dixon  
Hazardous and Solid Waste Division  
Texas Water Commission  
Post Office Box 13087, Capitol Station  
Austin, Texas 78711

Re: Fort Bliss  
E.P.A. I.D. No. TX4213720101

Dear Mr. Dixon:

Enclosed is a copy of the inspection report completed by Region 6 during its lead inspection at Fort Bliss on November 14 and 15, 1985. It is noted that while Region 6 conducted the inspection at the facility, TWC is expected to initiate the enforcement action. Possible violations at this facility include:

A. Generator Checklist

1. Manifest

- Facility does not use manifest for transporting hazardous waste which is recycled.

40 CFR 262.20 (a) / TAC 335.10 pg. 2 (Class I)

Generators of wastes destined for recycling may be subject to notification, manifest, pre-transport, and short term storage requirements (40 CFR Part 262). Facility should prove these wastes are exempt.

- Generator did not file an exception report on manifest #57101 when a copy of manifest was not returned within 45 days.

40 CFR 262.42 (b) / TAC 335.72(b) pg. 3 (Class II)

2. Satellite Accumulation

- Containers are not closed.

40 CFR 262.34 (c) / None pg. 4 (Class I)

- Containers not marked with the words "hazardous waste" or identification of the contents.

40 CFR 262.34 / None pg. 4 (Class I)

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- ° Containers holding waste accumulation exceeding one (1) quart of acutely hazardous waste or 55 gallons of other hazardous wastes are not marked with the date the excess began accumulating and the excess amounts have remained in the satellite area longer than three days.

40 CFR 262.34 (c)

/ None

pg. 4 (Class I)

#### B. ISN Checklist

##### 1. Waste Analysis

- ° A sign with the legend, "Danger - Unauthorized Personnel Keep Out," is not posted at the entrance and at other locations in sufficient numbers to be seen from any approach to the active portion of the facility. There are also no signs in Spanish.

40 CFR 265.14 (c)

/ TAC 335.115 (c)

pg. 3 (Class II)

##### 2. General Inspection Requirements

- ° Written inspection schedule does not include inspection of safety and emergency equipment.

40 CFR 265.15 (b) (1)

/ TAC 335.116 (a)

pg. 3 (Class II)

- ° Inspection log does not include date and time of inspection and date and nature of repairs or remedial action. Also records of the inspection log are not maintained at the facility for three (3) years.

40 CFR 265.15 (d)

/ TAC 335.116 (d)

pg. 3 (Class II)

##### 3. Personnel Training

- ° Training program does not include:

- (1) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment.
- (2) Key parameters for automatic waste feed cut-off systems.
- (3) Operation of communication or alarm systems.
- (4) Response to fires, explosions and groundwater contamination incidents.
- (5) Shutdown of operations.
- (6) General hazardous waste management procedures.

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- Program is not directed by a person trained in hazardous waste.
- Personnel have not completed annual training reviews.

40 CFR 265.16 / TAC 335.117 pg. 4 (Class II)

4. Preparedness and Prevention

- Facility is not maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or environment.

40 CFR 262.31 / TAC 335.66 pg. 5 (Class I)

5. Recordkeeping and Reporting

- Operating record does not contain location and quantity of each hazardous waste at each location.

40 CFR 265.73 (b) (1) / TAC 335.173 (b) pg. 7 (Class II)

- Operating record does not contain monitoring, testing or analytical data where required.

40 CFR 265.73 (b) (6) / TAC 335.173 (b) pg. 9 (Class II)

C. Containers Storage Checklist

1. Containers

- Containers are not in good condition.

40 CFR 265.171 (a) / TAC 335.242 pg. 1 (Class I)

- Containers holding hazardous waste are not closed during storage.

40 CFR 265.173 (a) / TAC 335.244 (a) pg. 1 (Class I)

- Containers holding hazardous waste are opened, handled or stored in such a manner as to cause the containers to rupture or leak.

40 CFR 265.173 (b) / TAC 335.244 (b) pg. 1 (Class I)

- Inspections are not conducted at least weekly.

40 CFR 265.174 / TAC 335.245 pg. 1 (Class II)

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- Containers holding incompatible wastes are not kept apart by physical barriers or sufficient distance.

40 CFR 265.177 (c) / TAC 335.247 (c) pg. 1 (Class I)

#### D. Closure Checklist

##### 1. Closure Plan

- Closure plan does not contain a description of decontamination procedures for facility equipment.

40 CFR 265.112 (a) (3) / TAC 335.213 (a) pg. 1 (Class II)

- Closure plan does not address all areas of hazardous waste management.

40 CFR 265.112 (a) / TAC 335.213 (a) pg. 1 (Class II)

- Closure plan does not have cost estimates available and modified as necessary.

40 CFR 265.142 / TAC 335.233 pg. 1 (Class II)

It was noted during the inspection that the Chromatic Pit and the Fire Training Area have stopped receiving waste and require immediate closure. Also, the drum storage area adjacent to the Fire Training Area may be an unpermitted storage area. As such, this area should also be closed. A closure plan should be submitted for these areas.

The facility has been disposing in the sanitary landfill still bottoms from the distillation of xylene. The inspector brought this practice to the attention of facility and the facility agreed to stop this practice. EPA would inquire about this practice at the next inspection.

Based on the nature of the violations listed above, EPA would issue this facility a RCRA 300R Administrative Order with penalties.

Should you have any questions or comments, or disagree with any of our findings or recommendations, please contact me at (214) 767-0730 or have your staff contact Rosemary Martine at (214) 767-0587.

Sincerely yours,

William H. Taylor, Jr., Chief  
Enforcement Section (AH-EE)

#### Enclosure

cc: ✓ D. Hannaschlaner AH-EE  
P. Stender AH-PA

W. Osgood AH-CD  
S. Schwartz AH-CT

D. Brown AH-UD  
D. Peters AH-SH

AHC:PMARTINE;m:PDIV001/12/85:FTULISS